UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

SHEILA PORTER

Plaintiff,

v.

ANDREA CABRAL, SUFFOLK COUNTY SHERIFF'S DEPARTMENT, and SUFFOLK COUNTY

Defendants.

Civil Action No.04-11935-DPW

PLAINTIFF SHEILA PORTER'S ASSENTED-TO MOTION FOR LEAVE TO FILE REPLY BRIEF IN FURTHER SUPPORT OF HER MOTION FOR ATTORNEYS' FEES

Pursuant to Local Rule 7.1(B)(3), plaintiff Sheila Porter ("Ms. Porter" or "plaintiff") respectfully seeks leave to file a Reply to defendants' Opposition to Ms. Porter's Motion for Attorneys' Fees ("Reply").

As grounds therefore, Ms. Porter states that the Reply, attached hereto as Exhibit A, addresses issues of law and fact raised in defendants' Opposition that were not addressed in Ms. Porter's moving papers. Moreover, the Reply identifies and narrows issues related to Ms. Porter's Motion and thus will assist the Court in resolving the Motion. Finally, defense counsel assents to the filing of the Reply.

WHEREFORE Ms. Porter respectfully requests that the Court grant her leave to file the accompanying Reply.

Respectfully submitted,

SHEILA PORTER

By her attorneys,

/s/ Joseph F. Savage, Jr.

Joseph F. Savage Jr. (BBO # 443030) David S. Schumacher (BBO # 647917) GOODWIN PROCTER LLP Exchange Place Boston, MA 02109 (617) 570-1000

Dated: August 7, 2006

CERTIFICATION UNDER LOCAL RULE 7.1

I hereby certify that counsel for Sheila Porter conferred with counsel for the Suffolk Defendants in a good faith attempt to resolve or narrow the issues in this motion prior to its filing and counsel for the Suffolk Defendants assents to the instant Motion.

Dated: August 7, 2006 /s/ Joseph F. Savage, Jr.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served electronically via the electronic filing system on counsel for all parties on this 7th day of August, 2006.

/s/ Joseph F. Savage, Jr.

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